

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Criminal Action No. 06-27-GMS
	)	
ANDREW YAO,	)	
	)	
Defendant.	)	

**JOINT REQUEST FOR SPECIAL VOIR DIRE**

COMES NOW the parties in the above-captioned case, through their undersigned attorneys, and hereby requests that the Court submit the following questions to the jury panel in the above-captioned case:

1. Is any member of the panel related to or personally acquainted with the defendant, Andrew Yao or his defense counsel, Brian McMonagle, Esq.?
2. Is any member of the panel related to, or personally acquainted with Assistant United States Attorneys Shannon Hanson or Douglas McCann or with any other employee of the United States Attorney's Office for the District of Delaware?
3. Do you know (witness list to be supplied - including the agents)?
4. This case involves charges of bankruptcy fraud. In light of those charges, have you or any close relative ever filed for bankruptcy? Have you or any close relative ever had contact with the Office of the U.S. Trustee?
5. Does any member of the panel have any personal knowledge of this case, or have you read or heard it discussed, or have an opinion regarding it?

6. Have you or any close relative ever been employed by Student Finance Corporation? Wilmington Trust Company? Royal Indemnity Company/Royal Insurance?
7. Have you or any close relative ever been employed in the gaming/gambling industry?
8. Have you, or any close relative, ever been investigated by the Federal Bureau of Investigation or the Internal Revenue Service?
9. Would the fact that the FBI or IRS were involved in the investigation in this case interfere with your ability to be fair and impartial?
10. Have you, or any close relative ever been associated employed by or ever had any bad experiences with a law enforcement agency either on a Federal, State or local level?
11. Would you give greater or lesser weight to the sworn testimony of a government agent or employee than you would the sworn testimony of a civilian witness solely because he or she is employed by the United States Government? Similarly, do any of you believe that a witness called by the government is more trustworthy and reliable than a witness called by the defendant, simply because the witness is called by the government instead of the defendant?
12. Have you served on a jury for a criminal case or on a Grand Jury before?
13. Other than traffic offenses, have you or any close relative ever been a witness to, victim of, or the subject of a criminal investigation and/or charged with a criminal offense?
14. Has any member of the panel ever testified in a criminal case?
15. Does any member of the panel have any special disability or problems that would make it difficult or impossible for you to serve as a member of the jury in this case?

16. This case involves a business known as Student Finance Corporation and some related businesses, including Wilmington Trust Company and Royal Indemnity Company. Is there anything about these businesses that would prevent you from being a fair and impartial juror?

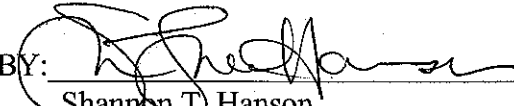
17. A fundamental principle of our legal system is that when a person is charged with a criminal offense he is presumed to be innocent unless and until the government proves guilty beyond a reasonable doubt. If you are selected as a juror in this case, will any of you have difficulty applying this rule of law?

18. The defendant has a constitutional right not to testify. Some people may feel that if an accused person does not testify, then he must be hiding something. In other words, they may expect the defendant should testify. Does any member of the panel believe that if an accused person does not testify, then he or she must be hiding something?

19. Does any member of the panel know of any other matter which you believe should be called to the court's attention as having some bearing up your qualifications or ability to sit as a juror, or which you think may prevent you from rendering a fair and impartial verdict based solely upon the evidence and my instructions to you on the law?

Respectfully submitted,

COLM F. CONNOLLY  
United States Attorney

BY:   
Shannon T. Hanson  
Assistant United States Attorney  
1007 N. Orange Street, Suite 700  
Wilmington, Delaware 19801

Dated: February 22, 2007

## CERTIFICATE OF SERVICE

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

Plaintiff,

V.

ANDREW YAO,

Defendant.

) ) ) ) ) ) ) ) )


) Criminal Action No. 06-27-GMS

I, Shannon T. Hanson, employed with the United States Attorney's Office, hereby certify that  
on February 22, 2007, I served the foregoing:

**JOINT REQUEST FOR SPECIAL VOIR DIRE**

by causing two copies of said document to be mailed and faxed to counsel of record as follows:

Brian McMonagle, Esq.  
McMonagle Perri McHugh and Mischak  
One Penn Square West, Suite 701  
30 S. 15th Street  
Philadelphia, PA 19102  
Attorney for Defendant Andrew Yao

  
Shannon T. Hanson